

**Berger & Montague, P.C.**  
ATTORNEYS AT LAW

**LAWRENCE J. LEDERER** ALSO ADMITTED IN DC

WRITER'S DIRECT DIAL 215/875-4625

WRITER'S DIRECT FAX 215/875-4604

WRITER'S DIRECT E-MAIL llederer@bm.net

June 30, 2014

**By ECF**

The Honorable Debra Freeman  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Re: *Dodona I, LLC v. Goldman, Sachs & Co., et al.*  
10 Civ. 7497 (VM)(DCF) (S.D.N.Y.)**

Dear Judge Freeman:

We represent lead plaintiff Dodona I, LLC ("Plaintiff") and the class.

We write to address Plaintiff's pending Motion for an Order Approving Notice to Class Members and Notice Procedures (Dkt. 155, filed May 8, 2014). On June 27, 2014, the U.S. Court of Appeals for the Second Circuit denied the petition filed by the Goldman Sachs defendants (collectively, the "Defendants") to appeal Judge Marrero's January 23, 2014 decision certifying the class, *Dodona I, LLC v. Goldman, Sachs & Co.*, 296 F.R.D. 261 (S.D.N.Y. 2014). The Second Circuit's mandate has been filed in this Court. *See* Dkt. 162.

As a result, Plaintiff proposes to further amend its proposed form of class notice to reflect the Second Circuit's decision. Specifically, the proposed revision is only to the last sentence of § 2 (at p. 3) and the last sentence of the second paragraph of § 8 (at p. 5) of the proposed notice. The proposed revised notice is attached as Exhibit 1.

The parties continue to disagree on a few remaining sentences of text in the proposed revised notice. A redlined copy of the proposed revised notice is attached as Exhibit 2. The redline compares the proposed revised notice attached here as Exhibit 1 to the last version Defendants sent to Plaintiff, and also adds the additional proposed edits to §§ 2 and 8 regarding

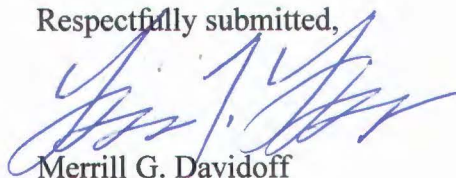
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the Second Circuit's ruling as discussed above. The parties are in agreement on the proposed text of the summary publication notice in full (*see* Dkt. 156-2), as well as all other aspects of the proposed revised notice and notice program.

We stand prepared to provide any additional information as the Court may direct.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Merrill G. Davidoff", is written over the typed name.

Merrill G. Davidoff  
Lawrence J. Lederer

Enclosures  
cc via ECF filing: Defendants' Counsel